



PO Box 4086
Palmer, AK 99645
(907) 982-2774
tclemmer@clemmerlaw.net
www.clemmerlaw.net

April 21, 2022

Via Online Submission and Electronic Mail to:

National Freedom of Information Officer
U.S. ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460
<https://foiaonline.gov/>
hq.foia@epa.gov

**RE: FREEDOM OF INFORMATION ACT REQUEST - Permitting History and Contamination
at Northern Oilfield Solutions, LLC Property in Deadhorse, Alaska**

Dear Freedom of Information Officer:

On behalf of a client who wishes to maintain confidentiality for business reasons, and pursuant to the Freedom of Information Act, 5 USC § 552 and implementing regulations 40 CFR § 2.100 *et seq*, I request copies of the records listed below in the possession or control of the U.S. Environmental Protection Agency (EPA).

The following record requests concern real property, facilities, equipment, operations, activities, and contamination at or near the following parcels of land: North Slope Borough, Deadhorse Land Leases, Block 301 (Lot 2B) and Block 303 (Lot 1 and Lot 6) ("Property") near the Deadhorse Airport in Deadhorse, Alaska. It is our understanding that the Property is currently leased to, and the facilities there are currently operated by, Northern Oilfield Solutions, LLC. The records requested below may also reference prior or concurrent ownership or operation by its predecessors and affiliated entities, such as NANA Oilfield Services, Inc., Northern Energy, LLC, Saltchuk Resources, Inc., and Saltchuk Holdings, Inc.

No Date Limitation:

1. All records concerning known or potential soil or groundwater contamination at the Property, including but not limited to spills, leaks, discharges, PRP notices, administrative orders, consent orders, site inspections, monitoring, assessments, characterizations, reports, cleanup actions, response actions, remedial actions, institutional controls, cost recovery, contribution, litigation, noncompliance, enforcement, correspondence, communications, etc.

2. All records concerning known or potential soil or groundwater contamination at the following sites at, adjacent to, or near the Property, which have been identified by the State of Alaska as: ADEC Hazard ID 25765 (NOS Block 301, Lot 2B); ADEC Hazard ID 25664 (NOS Block 303, Lot 1); ADEC Hazard ID 1963/ADL 421501 (Alaska DOT&PF Maintenance Facility); LAS 17794 (Chevron Drilling Waste Pit); ADEC Hazard ID 26413 (ADOT Block 304, Lot 1B); and ADEC Hazard ID 25471 (ADOT Block 304, Lot 2A), including but not limited to spills, leaks, discharges, PRP notices, administrative orders, consent orders, site inspections, monitoring, assessments, characterizations, reports, cleanup actions, response actions, remedial actions, institutional controls, off-site migration, cost recovery, contribution, litigation, noncompliance, enforcement, correspondence, communications, etc.

Dated On or After January 1, 2010:

3. All records concerning oil storage, handling, and distribution facilities and operations at the Property, including but not limited to Facility Response Plans, Spill Prevention Control & Countermeasure Plans, and other records concerning oil-related facilities, equipment, activities, operations, plans, reports, inspections, permits, applications, renewals, authorizations, noncompliance, enforcement, adjudication, litigation, correspondence, communications, etc.
4. All records concerning solid and hazardous waste management facilities and operations at the Property, including but not limited to solid and hazardous waste-related facilities, equipment, activities, operations, plans, reports, inspections, permits, applications, renewals, authorizations, noncompliance, enforcement, adjudication, litigation, correspondence, communications, etc.
5. All records concerning hazardous chemicals (including extremely hazardous substances and toxic chemicals) storage, handling, and distribution facilities and operations as well as discharges and releases at or from the Property, including but not limited to EPCRA Tier 1 and Tier 2 reports, Toxic Release Inventory reports, and other records concerning hazardous chemical-related facilities, equipment, activities, operations, releases, discharges, plans, reports, inspections, permits, applications, renewals, authorizations, noncompliance, enforcement, adjudication, litigation, correspondence, communications, etc.
6. All records concerning air pollutant emitting facilities and operations at the Property, including but not limited to new source review, Title V operating permits, general permits, PALs, and other air emission-related facilities, equipment, activities, operations, plans, reports, inspections, permits, applications, renewals, authorizations, noncompliance, enforcement, adjudication, litigation, correspondence, communications, etc.

As used throughout this letter, the terms “record” and “records” shall mean all materials in whatever form (handwritten, typed, electronic, or otherwise produced, recorded, reproduced or stored) in EPA’s possession, including, but not limited to correspondence, meeting minutes, memoranda, notes, e-mails, notices, electronic files, tapes, photos, videos, and facsimiles.

If the record requests above are unclear, would generate voluminous records, or would otherwise be difficult to respond to in a timely manner, please contact us right away. We would appreciate the opportunity to address such concerns and potentially clarify or narrow the scope of our requests in order to help simplify and expedite your response efforts.

We ask that responsive records be released as soon as they are available, but in no event later than required by 40 CFR § 2.104 or other laws or regulations. To the extent that a subset of the requested records is readily available, please send them on a rolling basis while EPA searches for other records. If any of the records requested here are already publicly available online or in a readily accessible location, please let us know where and how to find them.

To the extent that records responsive to this request are available in a widely-used electronic format (*e.g.*, PDF, Excel, Word), please provide them to us electronically via email or through an online sharing or FTP site or other similar means. If some or all of the records are only available in hard copy, please notify us of the estimated cost for searching, compiling, and copying the records before incurring such expenses. After consulting with us about the cost and time for production and possible ways to simplify and expedite the response, please mail any records that can only be produced in hard copy to me at the address listed above.

If you have any questions or concerns, or if there is anything I can do to help facilitate a timely and straightforward response, please do not hesitate to contact me at 907-982-2774 or tclemmer@clemmerlaw.net.

Thank you for your assistance.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'T. Clemmer', with a stylized flourish at the end.

Teresa B. Clemmer
Owner & Managing Attorney